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**From:** Lara, Rhina [Lara.Rhina@epa.gov]  
**Sent:** 3/4/2021 5:01:23 PM  
**To:** Koch, Erin [Koch.Erin@epa.gov]; Echeverria, Marietta [Echeverria.Marietta@epa.gov]; Aubee, Catherine [Aubee.Catherine@epa.gov]  
**CC:** Leifer, Kerry [Leifer.Kerry@epa.gov]  
**Subject:** RE: PFAS Q&A on 6(a)(2)

Got it!

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**From:** Koch, Erin <Koch.Erin@epa.gov>  
**Sent:** Thursday, March 4, 2021 12:00 PM  
**To:** Lara, Rhina <Lara.Rhina@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>  
**Cc:** Leifer, Kerry <Leifer.Kerry@epa.gov>  
**Subject:** RE: PFAS Q&A on 6(a)(2)

Sorry, one last tweak in red and strike the (2) since we are being less certain.

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**From:** Lara, Rhina <Lara.Rhina@epa.gov>  
**Sent:** Thursday, March 04, 2021 11:56 AM  
**To:** Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>  
**Cc:** Leifer, Kerry <Leifer.Kerry@epa.gov>  
**Subject:** RE: PFAS Q&A on 6(a)(2)

I added potentially and changed the “must” to “should.” I can run this by Tala, if needed.

**8. What should pesticide registrants do if they find PFAS in their production lines?**

# Ex. 5 Deliberative Process (DP)

Best,  
**Rhina M. Lara** (*she/her/hers*)  
Communications Branch  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
Phone: (202) 815- 5722

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**From:** Echeverria, Marietta <Echeverria.Marietta@epa.gov>  
**Sent:** Thursday, March 4, 2021 11:50 AM  
**To:** Koch, Erin <Koch.Erin@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Lara, Rhina <Lara.Rhina@epa.gov>  
**Cc:** Leifer, Kerry <Leifer.Kerry@epa.gov>  
**Subject:** RE: PFAS Q&A on 6(a)(2)

I am good with “potentially” and “should”

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**From:** Koch, Erin <Koch.Erin@epa.gov>  
**Sent:** Thursday, March 4, 2021 11:44 AM  
**To:** Aubee, Catherine <Aubee.Catherine@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Lara, Rhina <Lara.Rhina@epa.gov>  
**Subject:** RE: PFAS Q&A on 6(a)(2)

I’m fine with “of potential...” but that isn’t enough to make 6a2 reporting required, so that wording goes with “should.”

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**From:** Aubee, Catherine <Aubee.Catherine@epa.gov>  
**Sent:** Thursday, March 04, 2021 11:41 AM  
**To:** Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>; Lara, Rhina <Lara.Rhina@epa.gov>  
**Subject:** RE: PFAS Q&A on 6(a)(2)

Can we say “of potential toxicological significance?”

If not, then I’m fine with reverting to the previous more generic language and the “should” instead of “must.”

I think there is a difference between

## Ex. 5 Deliberative Process (DP)

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I think OPPT typically reviews these prior to release – correct?

Best,  
Catherine

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**From:** Echeverria, Marietta <Echeverria.Marietta@epa.gov>  
**Sent:** Thursday, March 04, 2021 11:38 AM  
**To:** Aubee, Catherine <Aubee.Catherine@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>; Lara, Rhina <Lara.Rhina@epa.gov>  
**Subject:** RE: PFAS Q&A on 6(a)(2)

This sentence is giving my pause:

## Ex. 5 Deliberative Process (DP)

Looping in Kerry to weigh in

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**From:** Aubee, Catherine <Aubee.Catherine@epa.gov>  
**Sent:** Thursday, March 4, 2021 11:25 AM

**To:** Koch, Erin <Koch.Erin@epa.gov>; Lara, Rhina <Lara.Rhina@epa.gov>

**Cc:** Echeverria, Marietta <Echeverria.Marietta@epa.gov>

**Subject:** RE: PFAS Q&A on 6(a)(2)

Okay, I did make one more edit– sorry! See below.

Best,  
Catherine

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**From:** Koch, Erin <Koch.Erin@epa.gov>

**Sent:** Thursday, March 04, 2021 11:23 AM

**To:** Lara, Rhina <Lara.Rhina@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>

**Cc:** Echeverria, Marietta <Echeverria.Marietta@epa.gov>

**Subject:** RE: PFAS Q&A on 6(a)(2)

If OPP is fine with this, I am (with one minor edit below since you've added the statement in the first paragraph).

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**From:** Lara, Rhina <Lara.Rhina@epa.gov>

**Sent:** Thursday, March 04, 2021 11:21 AM

**To:** Koch, Erin <Koch.Erin@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>

**Cc:** Echeverria, Marietta <Echeverria.Marietta@epa.gov>

**Subject:** RE: PFAS Q&A on 6(a)(2)

Thank you, Erin. That's really helpful. I incorporated your edits below and linked to the CFR (let me know if these are the appropriate links). Let me know if this looks good:

**8. What should pesticide registrants do if they find PFAS in their production lines?**

# Ex. 5 Deliberative Process (DP)

Best,  
**Rhina M. Lara** (*she/her/hers*)  
Communications Branch  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
Phone: (202) 815- 5722

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**From:** Koch, Erin <Koch.Erin@epa.gov>

**Sent:** Thursday, March 4, 2021 11:08 AM

**To:** Aubee, Catherine <Aubee.Catherine@epa.gov>; Lara, Rhina <Lara.Rhina@epa.gov>

**Cc:** Echeverria, Marietta <Echeverria.Marietta@epa.gov>

**Subject:** RE: PFAS Q&A on 6(a)(2)

I agree the linking the general 6a2 site is best. I also have some suggestions on the text and notes to consider in brackets:

**8. What should companies do if they find PFAS in their production lines?**

# Ex. 5 Deliberative Process (DP)

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**From:** Aubee, Catherine <[Aubee.Catherine@epa.gov](mailto:Aubee.Catherine@epa.gov)>

**Sent:** Tuesday, March 02, 2021 5:22 PM

**To:** Lara, Rhina <[Lara.Rhina@epa.gov](mailto:Lara.Rhina@epa.gov)>

**Cc:** Koch, Erin <[Koch.Erin@epa.gov](mailto:Koch.Erin@epa.gov)>; Echeverria, Marietta <[Echeverria.Marietta@epa.gov](mailto:Echeverria.Marietta@epa.gov)>

**Subject:** RE: PFAS Q&A on 6(a)(2)

Hi Rhina,

There are a number of relevant PR notices, so I would cite more generally to the EPA website for this purpose – I edited the link below.

I made a few edits. Looping in Erin to make sure I'm not creating any problems with my suggestions. Please revise further as needed.

Thanks!

Best,  
Catherine

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**From:** Lara, Rhina <[Lara.Rhina@epa.gov](mailto:Lara.Rhina@epa.gov)>

**Sent:** Tuesday, March 02, 2021 4:59 PM

**To:** Aubee, Catherine <[Aubee.Catherine@epa.gov](mailto:Aubee.Catherine@epa.gov)>

Cc: Ozmen, Shamus <[Ozmen.Shamus@epa.gov](mailto:Ozmen.Shamus@epa.gov)>

Subject: PFAS Q&A on 6(a)(2)

Hi Catherine,

As a follow-up to our call just now, could you please take a look at this new Q&A?

**8. What should companies do if they find PFAS in their production lines?**

## Ex. 5 Deliberative Process (DP)

Is that the correct section to link to or should I be linking to 159.179(b)? <https://www.govinfo.gov/content/pkg/CFR-2013-title40-vol25/pdf/CFR-2013-title40-vol25-sec159-178.pdf> << *I changed to the EPA website on 6a2 reporting, but hoping Erin can advise if we want to provide more specific legal citations*

Best,

**Rhina M. Lara** (*she/her/hers*)

Communications Branch

Office of Chemical Safety and Pollution Prevention

U.S. Environmental Protection Agency

Phone: (202) 815- 5722